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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91216824
Party	Plaintiff Buckingham Asset Management, LLC
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Date	03/11/2016
Attachments	BuckinghamJointMotion.pdf(14953 bytes)

CERTIFICATE OF MAILING VIA ELECTRONIC TRANSMISSION

I hereby certify that this correspondence is being filed with the United States Patent and Trademark Office via the Electronic System for Trademark Trials and Appeals on March 11, 2016.

/Michelle Alvey/

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of Serial Nos. 86005534, 86005612, 86005628, and 86005577

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Buckingham Asset Management, LLC :
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Opposer, :
 :
v. : Opposition No. 91216824
 :
 :
The Buckingham Research Group, Incorporated :
 :
Applicant. :
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**JOINT MOTION TO EXTEND DISCOVERY AND TRIAL DATES
AND STATUS REPORT**

Opposer, Buckingham Asset Management, LLC (“Opposer”), and Applicant, The Buckingham Research Group, Incorporated (“Applicant”), through their designated counsel and pursuant to TBMP 509.01(a), jointly move for a 90-day extension of all discovery and trial dates. In support thereof, the parties state as follows:

1. On December 14, 2015, the Parties jointly requested an extension of all deadlines to allow time to continue their settlement negotiations and to determine if resolution is possible.
2. On December 15, 2015 the Board granted the motion, but required the parties to continue to submit a progress report demonstrating good cause for any extension pursuant to the guidelines set forth in the Board’s September 11, 2015, order.

3. Since that date, Applicant provided a proposed written settlement agreement to counsel for Opposer. Counsel for Opposer is coordinating with Opposer regarding the written draft and expects to provide comments to counsel for Applicant shortly.
4. As indicated in the prior motion, both parties have dealt with and/or are dealing with internal business or personnel changes since the commencement of the opposition proceeding, but are equally dedicated to trying to resolve the issues in this opposition proceeding amicably.
5. As also previously mentioned, counsel for the parties have discussed and negotiated Opposer's settlement proposal via telephone on September 16, 2014, October 15, 2014, November 12, 2014, November 25, 2014, April 10, 2015, and September 10, 2015; and via email on July 18, 2014, July 21, 2014, February 3, 2015, March 11, 2015, March 23, 2015, May 15, 2015, June 25, 2015, July 7, 2015, July 15, 2015, July 16, 2015, December 11, 2015. The parties have now exchanged a written settlement agreement incorporating the terms that have been discussed. The settlement agreement would resolve all issues in the proceedings.
6. As such, the parties request a 90 day extension of all dates to determine if they will be able to finalize settlement and the written agreement.
7. In consideration of the information provided herein, Applicant and Opposer respectfully submit that there is good cause for an extension and request that this matter be extended 90 days and the discovery and trial dates be reset as follows:

Time to Answer :	06/11/2016
Deadline for Discovery Conference :	07/11/2016
Discovery Opens :	07/11/2016
Initial Disclosures Due :	08/10/2016
Expert Disclosure Due :	12/08/2016
Discovery Closes :	01/07/2017
Plaintiff's Pretrial Disclosures :	02/21/2017

Plaintiff's 30-day Trial Period Ends : 04/07/2017
Defendant's Pretrial Disclosures : 04/22/2017
Defendant's 30-day Trial Period Ends : 06/06/2017
Plaintiff's Rebuttal Disclosures : 06/21/2017
Plaintiff's 15-day Rebuttal Period Ends : 07/21/2017

WHEREFORE, the parties respectfully request that their joint motion be granted.

Dated: March 11, 2016

Respectfully submitted,

/Meredith D. Pikser/
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Attorneys for Opposer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been duly served on the Applicant by mailing a copy of same via U.S. Mail, postage prepaid, on this 11th day of March 2016 to:

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/Michelle Alvey/